

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>EDNA WEBB, <i>et al.</i>,</b>	§	
<b>Plaintiffs,</b>	§	
	§	<b>No. 4:14-cv-03302</b>
<b>v.</b>	§	<b>Consolidated with</b>
	§	<i>Adams v. Livingston</i> , 4:14-cv-3326
	§	<i>Togonidze v. Livingston</i> , 4:14-cv-3324
<b>BRAD LIVINGSTON, <i>et al.</i>,</b>	§	
<b>Defendants.</b>	§	

**DEFENDANT TEXAS DEPARTMENT OF CRIMINAL JUSTICE’S NOTICE OF  
FIFTH SUPPLEMENTAL DISCLOSURES TO PLAINTIFFS**

**TO THE HONORABLE JUDGE OF SAID COURT:**

NOW COMES Defendant Texas Department of Criminal Justice (TDCJ), by and through its attorney of record, the Office of the Attorney General for the State of Texas, to give notice to the Court of Defendant TDCJ’s Fifth Supplement to Initial Disclosures to Plaintiffs in accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure.

This supplemental disclosure consists of records which are also responsive to: (a) Plaintiff Kevin Webb’s First Requests for Production upon TDCJ numbers 18, 32, 36, and 38, (b) Plaintiffs’ Second Consolidated Requests for Production upon TDCJ numbers 6-7, 10, 17, 20-21, 29 and 32-39, and (c) Plaintiff Kevin Webb’s First Request for Production upon Defendant Tommie Haynes number 3. TDCJ’s responses to these requests for production were supplemented concurrently with this Fifth Supplemental Disclosure.

DATED: February 3, 2017

Respectfully submitted,

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*/s/Amanda M. Kates*  
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**ATTORNEYS FOR TDCJ DEFENDANTS**

**NOTICE OF ELECTRONIC FILING**

I, **AMANDA M. KATES**, Assistant General of Texas, do hereby certify that I have electronically submitted for filing, a true and correct copy of the above in accordance with the Electronic Case Files System of the Southern District of Texas, on this the 3<sup>rd</sup> day of February, 2017.

/s/Amanda M. Kates  
**AMANDA M. KATES**  
Assistant Attorney General

## **CERTIFICATE OF SERVICE**

I, **AMANDA M. KATES**, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing Defendant Texas Department of Criminal Justice's Notice of Fifth Supplemental Disclosures to Plaintiffs has been served by e-mail and via CMRRR, on this 3<sup>rd</sup> day of February, 2017 addressed to:

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**Via CMRRR 7010 1870 0000 9847 2974**

**and via e-mail to:**

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**/s/Amanda M. Kates**

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